UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

Caron Nazario :

Plaintiff,

v. : Civil Action No. 2:21-cv-00169

Joe Gutierrez, : JURY DEMANDED BY

In his personal capacity : PLAINTIFF

and :

Daniel Crocker

In his personal capacity,

Defendants. :

<u>DEFENDANT CROCKER'S PARTIAL MOTION TO DISMISS PLAINTIFF'S</u> COMPLAINT REGARDING CLAIM FOR FIRST AMENDMENT VIOLATION

Now Comes Defendant Daniel Crocker, by counsel, and joins in Defendant Joe Gutierrez's Partial Motion to Dismiss the Plaintiff's Complaint Regarding Claim for First Amendment Violation for the reasons set forth in Gutierrez's Memorandum of Law in Support of this Motion [Doc. 16] as if fully set forth herein.

Respectfully submitted this 17th day of May, 2021.

DANIEL CROCKER

By: <u>/s/ Anne C. Lahren</u>

Richard H. Matthews, Esq. Virginia State Bar No. 16318 *Pender & Coward, P.C.* 222 Central Park Avenue, Suite 400 Virginia Beach, VA 23462-3026 (757) 490-6256 – Telephone (757) 497-1914 – Facsimile

Email: rmatthew@pendercoward.com

Counsel for Daniel Crocker

Robert L. Samuel, Jr., Esq.
Virginia State Bar No. 18605 **Pender & Coward, P.C.**222 Central Park Avenue, Suite 400
Virginia Beach, VA 23462-3026
(757) 502-7338 – Telephone
(757) 497-1914 – Facsimile
Email: rsamuel@pendercoward.com
Counsel for Daniel Crocker

Anne C. Lahren, Esq.
Virginia State Bar No. 73125

Pender & Coward, P.C.

222 Central Park Avenue, Suite 400
Virginia Beach, VA 23462-3026
(757) 490-6293 – Telephone
(757) 497-1914 – Facsimile
E-Mail: alahren@pendercoward.com
Counsel for Daniel Crocker

CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of May, 2021, I will electronically file the foregoing *PARTIAL MOTION TO DISMISS PLAINTIFF'S COMPLAINT REGARDING CLAIMS FOR FIRST AMENDMENT VIOLATION* with the Clerk of Court using the CM/ECF system, which will then notification of such electronic filing (NEF) to the following:

Jonathan M. Arthur, Esq (VSB# 86323)
j.arthur@robertslaw.org
Thomas H. Roberts, Rsw. (VSB# 26014)
Tom.roberts@robertslaw.org
Andrew T. Bodoh, Esq. (VSB# 80143)
Andrew.bodoh@robertslaw.org
15 South First Street
Richmond, VA 23219
(804) 991-4308 (Direct)
(804) 783-2000 (Firm)
(804) 783-2105 (Fax)
Counsel for the Plaintiff

John B. Mumford, Jr. (VSB No. 38764) Coreen A. Silverman (VSB No. 43873) HANCOCK, DANIEL & JOHNSON, P.C. 4701 Cox Road, Suite 400 Glen Allen, Virginia 23060
Telephone: (804) 967-9604
Facsimile: (804) 967-9888
jmumford@hancockdaniel.com
csilverman@hancockdaniel.com
Counsel for Defendant Joe Gutierrez

/s/ Anne C. Lahren
Anne C. Lahren, Esq.
Virginia State Bar No. 73125

Pender & Coward, P.C.
222 Central Park Avenue, Suite 400
Virginia Beach, VA 23462-3026
(757) 490-6293 – Telephone
(757) 497-1914 – Facsimile
E-Mail: alahren@pendercoward.com

Counsel for Daniel Crocker